



**KENNETH M. ABELL**  
646-970-7341 (direct dial)  
[kabell@aellaw.com](mailto:kabell@aellaw.com)  
[aellaw.com](http://aellaw.com)

256 Fifth Avenue, 5<sup>th</sup> Floor  
New York, New York 10001

October 1, 2024

**By ECF**

Honorable Brian M. Cogan  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: United States v. Linda Sun, a/k/a “Wen Sun,” “Ling Da Sun,” and “Linda Hu,” and Chris Hu, 24 Cr. 346 (BMC) (TAM)**

Your Honor:

We represent Linda Hu in the above-referenced case and write respectfully to request a clarification of one component of our client’s condition of release. Specifically, we propose a clarification to the condition that our client have no contact with the consulate or mission of the People’s Republic of China (“PRC”). (*See* Doc. No. 13 at 1.) For the reasons set forth in our letter to the Court dated September 24, as well as those that we discussed with Your Honor during the initial status conference on September 25, we respectfully request that the Court clarify this condition to provide as follows:

The condition of release regarding contact between Linda Hu and the PRC Consulate or Mission is hereby clarified to prohibit: (a) any travel to the consulate or mission; (b) any attempts to contact (whether orally or in writing) representatives of the consulate or mission; and (c) any discussions with representatives of the consulate or mission regarding this case and related subject matters, or any discussions with such individuals in a private setting, outside the presence of counsel.

We have conferred with the Government regarding the above clarification, and have been informed that it has no objection to this request. We thank the Court for its time and attention to this matter.

Respectfully submitted,

By: /s/ Kenneth M. Abell  
ABELL ESKEW LANDAU LLP  
Kenneth M. Abell  
Jarrod L. Schaeffer  
Scott Glicksman

256 Fifth Avenue, 5th Floor  
New York, NY 10001  
(646) 970-7341 / -7339 / -7338  
[kabell@aellaw.com](mailto:kabell@aellaw.com)  
[jschaeffer@aellaw.com](mailto:jschaeffer@aellaw.com)  
[sglicksman@aellaw.com](mailto:sglicksman@aellaw.com)  
*Counsel for Linda Hu*